## Allen's Scrap & Salvage Ltd.

302 Second Avenue Prince George, B.C **V2L 2Z5** 

February 21, 2000

Mr. Vernon A Williams, Secretary Surface Transpiration Board Office of the Secretary Case Control Unit Attn: STB Ex Parte No. 582 1925 K Street, N.W. Washington, D.C. 20423-0001

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Office of the Secretary FEB 29 2000



Dear Sir:

The purpose of this letter is to comment on the issues to be discussed on March 8th, 2000 in Ex Parte 582.

Allen's Scrap & Salvage Ltd. processes for recycling non ferrous and ferrous materials. Rail freight is the most economical mode of transportation to move approximately 30,000 tons of ferrous materials to various destinations in Canada and U.S. annually.

We encourage the Surface Transportation Board to focus on whether the proposed CN-BNSF combination is good for shippers, not on potential downstream effects. We suggest this combination will have good potential to boost our competitiveness on the west coast market. Thus far, streamlining shipments from northern B.C. to west coast destinations from Washington to California. The CN-BNSF combination should be judged on its merits and if other carriers propose mergers, then these cases ought to be evaluated on their merits.

The timing of the proposed CN-BNSF combination is not the central issue for our company. Our concern is service. Gateways to Seattle from CN New West are congested and switches are time consuming. CN - BNSF unification would alleviate this congestion and resulting time delay. CN and BNSF have guaranteed us equal or better rail service and route options after the combination takes effect, though recent mergers have failed on service, CN- BNSF say they have anticipated all avenues to make sure customers do not have service problems or loss of routes. Accordingly, the Surface Transportation Board should focus on ensuring that CN-BNSF combination, and any other future mergers, will deliver service.

The Surface Transportation Board has a comprehensive process to evaluate railroad transactions and protect the public interest. It should fairly evaluate the CN-BNSF combination and not let other railroads use the Surface Transportation Board process for protection from increased competition. Competition encourages change and improvement. The CN- BNSF combination will provide the best service in our industry. This competition will in turn encourage others in the railroad industry to offer their customers excellent service.

Yours truly,

LLEN'S SCRAP & SALVAGE LTD.

John Bartkowski

